

TRUDY L. MARTIN
LAW OFFICES OF TRUDY L. MARTIN
State Bar No. 148515
1808 Sixth Street
Berkeley, CA 94710
(510) 843-4300

Attorneys for Plaintiff RAMON JERMAINE SAPP

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RAMON JERMAINE SAPP,

Plaintiff,

vs.

COUNTY OF ALAMEDA, COUNTY OF
ALAMEDA SHERIFF'S DEPARTMENT,
SHERIFF CHARLES PLUMMER, sued herein
individually and in his capacity and as Sheriff,
Alameda County, PRISON HEALTH
SERVICES, INC., ALAMEDA COUNTY
MEDICAL CENTER dba HIGHLAND
HOSPITAL, and DOES 1 through 30; and
DOES 1 through 30, inclusive,

Defendants.

NO. 03-1066 PJH

STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING EXPERT
DISCLOSURE AND RELATED PRE-
TRIAL DEADLINES

Current Trial Date: June 9, 2006
Time: 8:30 a.m
Place: Courtroom 3, 17th Floor

IT IS STIPULATED AND AGREED BY PARTIES THROUGH COUNSEL OF RECORD, as
follows:

The pre-trial discovery deadline in this case for exchange of expert witnesses and reports
is currently set by this Court on July 18, 2005. This deadline was extended by stipulation of the
parties from the original date of June 29, 2005. The deadline for expert and non-expert discovery
presently is August 10, 2005, and the deadline for hearing dispositive motions is October 5, 2005.

1 The parties hereby jointly request and stipulate that the Court extend these discovery and related
 2 pre-trial deadlines, as follows: expert disclosure will be extended until July 25, 2005, expert and
 3 non-expert discovery will be extended until August 17, 2005, and the current deadline for hearing
 4 dispositive motions will be continued one week from October 5, 2002, to October 12, 2005.

5 The reason for this request is as follows:

6 This stipulation and request for extension of pre-trial deadlines is brought pursuant to
 7 Local Rule 7-10(b). Discovery requests by plaintiff directed to defendants Alameda County
 8 Medical Center and Alameda County, Alameda County Sheriff's Department, Sheriff Charles
 9 Plummer and Prison Health Services, Inc. seek documents which plaintiff contends relate to and
 10 materially affect the scope and basis of likely expert opinion testimony at trial. Production of
 11 these documents was due on or about July 8 and 9, 2005, but continued by agreement as part of a
 12 meet and confer effort between the parties. Plaintiff continues to have concerns that without these
 13 documents and further discovery responses, it may become necessary to engage in rounds of
 14 supplemental disclosures as documents are made available. The parties jointly request an
 15 extension of the disclosure date in order to complete production of documents and develop
 16 appropriate expert disclosures. The stipulation and request for extension of additional pre-trial
 17 deadlines reflect this extended schedule and the anticipated unavailability of counsel.

18 Further, the parties hereby stipulate that this Court order said continuance for good cause.

19 IT IS SO STIPULATED

20 DATED:

LAW OFFICES OF TRUDY L. MARTIN

21
 22
 23 Trudy L. Martin, Attorneys for Plaintiff
 24 RAMON JERMAINE SAPP

25 GALLOWAY, LUCCHESI, EVERSON & PICCHI

26
 27
 28 By Martin J. Everson, Esq.

Attorney for Alameda County Medical Center

LAW OFFICES OF NANCY HUDGINS

By Matthew Grigg, Esq.
Attorney for Alameda County, Alameda County
Sheriff's Department, Sheriff Charles Plummer and
Prison Health Services, Inc.

IT IS HEREBY ORDERED THAT

The pretrial expert disclosure date is continued from July 18, 2005, to July 25, 2002. The expert and non-expert discovery deadline is continued one week to August 17, 2005, and the deadline for hearing dispositive motions is also continued one week, until October 12, 2005.

DATED: 7/18/05



UNITED STATES DISTRICT COURT JUDGE